

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JEAN PIERRE LAFOREST,

Plaintiff,

– *against* –

JOHN DOE, *Security Guard*, JOHN DOE NYPD  
OFFICERS 1-4, FAMILY DOLLAR, *West Farms*  
*Location*, THE CITY OF NEW YORK,

Defendants.

**ORDER**

25-cv-03719 (ER)

Ramos, D.J.:

Mr. Laforest, who is appearing *pro se*, brings this action under 42 U.S.C. § 1983, alleging that Defendants violated his federally protected rights. By order dated June 16, 2025, the Court granted Mr. Laforest’s request to proceed *in forma pauperis* (“IFP”), that is, without prepayment of fees. Doc. 7.

**DISCUSSION**

**A. Service on Family Dollar Store**

On June 26, 2025, the Court ordered Mr. Laforest to provide to the Court, in writing, an address where the United States Marshal Service (“USMS”) can serve the defendant Family Dollar Store in the West Farms neighborhood of the Bronx.<sup>1</sup> Doc. 9. On July 21, 2021, Mr. Laforest filed a notice of motion requesting that the Court subpoena, from the Legal Department of the Family Dollar Store, video surveillance footage from a Family Dollar Store located in East Tremont Ave, Bronx, NY, 10460. Doc. 11. In that notice of motion, Mr. Laforest identifies the following address for

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<sup>1</sup> The Court construes the defendant which Mr. Laforest identifies as “Family Dollar (West Farms location)” in the complaint, and for which he provides an address to “Legal Department, Family Dollar Stores LLC” in his motion for a subpoena, to be the Family Dollar’s corporate parent, not the particular store in the Bronx.

service on Family Dollar: Legal Department, Family Dollar Stores LLC, 500 Volvo Parkway, Chesapeake, VA 23320. Doc. 11.

The Clerk of Court is directed to issue a summons for Family Dollar and to deliver to the USMS all of the paperwork necessary for the USMS to effect service of the summons and complaint upon Family Dollar at 500 Volvo Parkway, Chesapeake, VA 23320. The Court extends the time to effect service of process by 90 days from the date of issuance of summons.

**B. Unidentified “John Doe”: Security Guard Defendant**

Under *Valentin v. Dinkins*, a *pro se* litigant is entitled to assistance from the district court in identifying an unidentified defendant and that defendant’s service address. 121 F.3d 72, 76 (2d Cir. 1997). In the complaint, Mr. Laforest supplies sufficient information to permit Family Dollar to identify the unidentified “John Doe” security guard defendant; he or she is the security guard who allegedly assaulted him on June 13, 2024 at a Family Dollar store located in the West Farms neighborhood of the Bronx. It is therefore ordered that Family Dollar, which appears to be the employer of the unidentified “John Doe” security guard, must ascertain the identity of the security guard and an address where that individual may be served. Family Dollar is ordered to provide this information to Mr. Laforest and the Court within thirty days of receiving service of process.

Within thirty days of receiving this information identifying John Doe’s identify and address, Mr. Laforest must file an amended complaint naming that individual defendant using the name provided and also providing his or her service address. The amended complaint will replace, not supplement, the original complaint. Once Mr. Laforest has filed an amended complaint, the Court will screen the amended complaint and, if necessary, issue an order directing service on that newly identified defendant.

**C. Mr. Laforest’s Request for the Issuance of a Subpoena**

As previously discussed, on July 21, 2021, Mr. Laforest filed a notice of motion

requesting that the Court subpoena video surveillance footage from a particular Family Dollar Store. Doc. 11. While it would not be appropriate to serve a subpoena on Family Dollar—which is identified as a defendant in Mr. Laforest’s complaint—at this juncture, Mr. Laforest will be free to request the video surveillance footage from Family Dollar once it has been served with process and the parties engage in discovery, during which the parties to this case will exchange information.

### CONCLUSION

The Clerk of Court is directed to issue a summons for Family Dollar and to deliver to the USMS all of the paperwork necessary for the Marshals Service to effect service upon Family Dollar. The Court extends the time to effect service of process by 90 days from the date of issuance of summons.

The Clerk of Court is further directed to mail a copy of this order and Mr. Laforest’s complaint to Family Dollar, Attn: Legal Department, 500 Volvo Parkway, Chesapeake, VA 23320.

Family Dollar is directed to identify the unidentified “John Doe” security guard and his or her service address—and to provide this information to Mr. Laforest and the Court—within thirty days of receiving service of process. Within thirty days of receiving this information, Mr. Laforest must file an amended complaint naming the newly identified individual as a defendant. An amended complaint form that Mr. Laforest should complete is attached to this order.

Mr. Laforest’s request for the issuance of a subpoena is denied, without prejudice to his seeking the same information during discovery. The Clerk of Court is respectfully directed to close the notice of motion, Doc. 11.

Plaintiff may receive court documents by email by completing the form, [Consent to Electronic Service](#).<sup>2</sup>

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<sup>2</sup> If Plaintiff consents to receive documents by email, Plaintiff will no longer receive court documents by regular mail.

The Clerk of Court is directed to mail a copy of this order to Mr. Laforest.

SO ORDERED.

Dated: July 29, 2025  
New York, New York

A handwritten signature in blue ink, appearing to read 'Edgardo Ramos', is positioned above a horizontal line.

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EDGARDO RAMOS, U.S.D.J.

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Write the full name of each plaintiff.

\_\_\_\_ CV \_\_\_\_  
(Include case number if one has been assigned)

-against-

**AMENDED**

**COMPLAINT**

Do you want a jury trial?

☐ Yes ☐ No

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Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

**NOTICE**

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

## I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- ☐ **Federal Question**
- ☐ **Diversity of Citizenship**

### A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

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### B. If you checked Diversity of Citizenship

#### 1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, \_\_\_\_\_, is a citizen of the State of  
(Plaintiff's name)

\_\_\_\_\_  
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

\_\_\_\_\_.

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, \_\_\_\_\_, is a citizen of the State of  
(Defendant's name)

\_\_\_\_\_  
or, if not lawfully admitted for permanent residence in the United States, a citizen or  
subject of the foreign state of

\_\_\_\_\_  
If the defendant is a corporation:

The defendant, \_\_\_\_\_, is incorporated under the laws of  
the State of \_\_\_\_\_

and has its principal place of business in the State of \_\_\_\_\_

or is incorporated under the laws of (foreign state) \_\_\_\_\_

and has its principal place of business in \_\_\_\_\_.

If more than one defendant is named in the complaint, attach additional pages providing  
information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional  
pages if needed.

First Name	Middle Initial	Last Name
Street Address		
County, City	State	Zip Code
Telephone Number	Email Address (if available)	

**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

First Name	Last Name	
Current Job Title (or other identifying information)		
Current Work Address (or other address where defendant may be served)		
County, City	State	Zip Code

Defendant 2:

First Name	Last Name	
Current Job Title (or other identifying information)		
Current Work Address (or other address where defendant may be served)		
County, City	State	Zip Code

Defendant 3:

First Name	Last Name	
Current Job Title (or other identifying information)		
Current Work Address (or other address where defendant may be served)		
County, City	State	Zip Code



Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

### III. STATEMENT OF CLAIM

Place(s) of occurrence:

Date(s) of occurrence:

## FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

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**INJURIES:**

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

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**IV. RELIEF**

State briefly what money damages or other relief you want the court to order.

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**V. PLAINTIFF'S CERTIFICATION AND WARNINGS**

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

Dated	Plaintiff's Signature
First Name	Middle Initial
	Last Name
Street Address	
County, City	State
	Zip Code
Telephone Number	Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes   ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.